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13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION
16

17 In re TFT-LCD (FLAT PANEL) ANTITRUST
LITIGATION

Master Docket No. 07-m-1827 SI

18 This Document Relates To:

19 *Motorola Mobility, Inc. v. AU Optronics*
20 *Corporation, et al., C 09-5840 SI*

**STIPULATION AND [PROPOSED]
ORDER EXTENDING PARTIES'
TIME TO MOVE TO COMPEL AS
TO CERTAIN DISCOVERY**

1 The undersigned Defendants in the above captioned-action and Plaintiff Motorola
2 Mobility, Inc. ("Motorola") stipulate as follows:

3 WHEREAS various Defendants have served discovery on Motorola prior to October 31,
4 2011 seeking discovery of the basis for Motorola's contentions in its complaint regarding
5 Defendants' participation in a conspiracy to affect the price of LCDs, to which Motorola has
6 served responses and objections ("Contention Discovery"), and Defendants also served
7 discovery requests related to other subjects, to which Motorola has served responses and
8 objections;

9 WHEREAS the parties have been in negotiations regarding an extension of time for
10 Motorola to supplement certain responses to the previously served discovery and to update its
11 chart of conspiracy evidence it served on May 24, 2011 as "Attachment A" to its responses to
12 certain discovery requests;

13 WHEREAS Motorola may serve supplemental responses to discovery requests served by
14 any Defendant not joining this Stipulation and this Stipulation is without prejudice to (a)
15 Motorola's ability to do so; or (b) the positions of any party not joining this stipulation with
16 respect to any such supplemental responses;

17 NOW THEREFORE, the parties stipulate and agree as follows:

18 1. Motorola will serve an updated Attachment A to include any supplemental
19 responses to the Contention Discovery by January 30, 2012 and the undersigned Defendants
20 shall have until March 1, 2012 to file motions to compel with respect to any supplemented
21 responses; and

22 2. Motorola will serve any supplemental responses it intends to provide related to
23 subjects other than the Contention Discovery by January 20, 2012, and undersigned Defendants
24 shall have until February 10, 2012 to file motions to compel with respect to any supplemented
25 responses.
26
27
28

1 Dated: December 28, 2011

2
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18 Pursuant to General Order 45, Part X-B, the filer attests that concurrence in
19 the filing of this document has been obtained from the other signatories.

20 /s/ Joshua C. Stokes

21 Joshua Stokes

22 IT IS SO ORDERED.

23
24 Dated: _____, 2011

25
26 Hon. Susan Illston, United States District Judge